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August 15, 2025

Via ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Nazaire v. St. Barnabas Hospital, et al.* – No. 1:24-cv-5022

Dear Hon. Judge Kuo:

We represent Plaintiff Kiara Nazaire (“Plaintiff”) in the above-captioned matter. We write jointly with both Defendants in accordance with the Court’s order dated July 25, 2025, which directed the parties to file a status report certifying the close of discovery. The parties hereby certify that discovery in this matter may be closed.

In addition, the parties have conferred and have agreed to the following proposed schedule for the submission of summary judgment pre-motion letters and Rule 56.1 statements as required by Rule 4.A. of Judge Donnelly’s individual practices.

- October 17, 2025 – Parties to exchange Rule 56.1 Statements
- November 17, 2025 – Parties to exchange Rule 56.1 Counterstatements
- November 24, 2025 – Parties to file pre-motion letters.

The parties respectfully request that the Court approve the above schedule.

We thank the Court for its attention to this matter.

Respectfully Submitted,

/s/ Lucas C. Buzzard

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